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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **KRYSTAL ROSSE, individually,**

11 Plaintiff,

12 v.

13 **CSAA GENERAL INSURANCE COMPANY;**  
14 **a foreign corporation, DOES I-**  
**X, and ROE CORPORATIONS I-X,**  
**inclusive,**

15 Defendant  
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2:17-cv-01557-JCM-VCF

**STIPULATION AND ORDER TO EXTEND**  
**DISCOVERY DEADLINES**  
**(Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, KRYSTAL  
18 ROSSE, and Defendant, CSAA GENERAL INSURANCE COMPANY to Extend  
19 Discovery Deadlines by 60 days.

20 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

21 The following discovery has been completed by the parties:  
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1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Defendant's First Set of Requests for Admissions to Plaintiff;
3. Defendant's First Set of Interrogatories to Plaintiff;
4. Defendant's First Set of Request for Production of Documents to Plaintiff;
5. Defendant's Designation of Expert Witnesses and Documents;
6. Defendant's First Supplemental Designation of Expert Witnesses and Documents;
7. Plaintiff's Initial Disclosure, pursuant to FRCP 26(f);
8. Defendant's First Supplemental Disclosures, pursuant to FRCP 26(f);
9. Defendant's Second Supplemental Disclosures, pursuant to FRCP 26(f);
10. Plaintiff's Responses to Defendant's First Set of Requests for Admissions;
11. Plaintiff's Responses to Defendant's First Set of Interrogatories;
12. Plaintiff's Responses to Defendant's First Set of Request for Production of Documents;
13. Deposition of Brian Rodems;

14. Deposition of Matthew Emmons;

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:**

1. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;

**A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

Defendant would like to take the depositions of Plaintiff's treating providers. Both parties are attempting to schedule the remaining depositions timely, but the parties are having difficulties accommodating all parties schedules.

Further, the parties have discussed a possible mediation as an option for settlement in an attempt to keep costs down. The parties are working toward arranging the mediation at this point.

**D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
Discovery Cut off:	05/04/2018	07/03/2018
Expert Disclosure:	12/22/2017	CLOSED
Rebuttal of Experts:	04/04/2018	CLOSED
Interim Status Report:	06/04/2018	05/04/2018
Dispositive Motions:	06/04/2018	08/04/2018
Pre Trial Order:	07/04/2018	09/03/2018

F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY  
DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

DATED this 2<sup>nd</sup> day of May, 2018.

RANALLI ZANIEL FOWLER & MORAN, ANTHONY PAGLIA INJURY LAWYERS  
LLC

/s/ Benjamin Carman  
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ORDER

IT IS SO ORDERED:

Dated: May 2, 2018



UNITED STATES MAGISTRATE JUDGE